

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Public Inquiry on Modification of Service
Performance Measurement Plan

Docket No. PI2021-3

PUBLIC REPRESENTATIVE COMMENTS

(September 17, 2021)

I. INTRODUCTION

The Public Representative hereby responds to Order No. 5975¹ which is in response to a Postal Service Request² to modify their current Service Performance Measurement (SPM) system. In that order, the Commission initiated this proceeding and asked interested persons to comment on “the Postal Service’s proposed modifications concerning the service performance measurement systems.” Order No. 5975 at 2. The Commission further reminded interested persons that the scope of this docket is limited to the Postal Service’s proposed revisions to the SPM Plan and not a platform to comment on Docket No. N2021-1.³ *Id.* The Postal Service filed its Request pursuant to 39 C.F.R. § 3055.5. Request at 1.

II. BACKGROUND

¹ Notice and Order Initiating Proceeding to Consider Modifications to Market Dominant Service Performance Measurements Systems, September 3, 2021 (Order No. 5975).

² United States Postal Service Notice of Filing Changes to Service Performance Measurement Plan Document, August 31, 2021 (Request).

³ See Docket No. N2021-1, Advisory Opinion on Service Changes Associated with First-Class Mail and Periodicals, July 20, 2021.

On July 5, 2018, in Docket No. PI2015-1, the Commission approved the current internal SPM systems.⁴ Since then, the Postal Service has filed multiple modifications. On September 20, 2018, in Docket No. PI2018-2, the Postal Service filed a modification to the SPM systems to reflect changes in “the actual service and operational capabilities of the Postal Service network.”⁵ On November 5, 2018, the Commission conditionally approved the proposed modification to the SPM systems and directed the Postal Service to file a revised SPM plan to address a number of concerns identified in Order No. 4872.⁶ On December 27, 2018, after the Postal Service filed a revised SPM plan and addressed the concerns regarding the description of the measurement system for First-Class Mail International, the Commission closed Docket No. PI2018-2. Most recently on May 21, 2019, in response to Order No. 4945, the Postal Service filed a modification that included the removal of references to the legacy external SPM system, a proposal to replace external SPM with internal SPM for two First-Class Mail International services and the Return Receipt (Green Card) service, and a request to use domestic SPM data as a proxy for certain aspects of international letters and flats service performance.⁷

III. COMMENTS

The Postal Service’s Request in this docket identifies two material changes to the current SPM system. First, the addition of reporting for Three-Day, Four-Day and Five-

⁴ Docket No. PI2015-1, Order Approving Use of Internal Measurement Systems, July 5, 2018 (Order No. 4697). See *also* Docket No. PI2015-1, Errata to Order No. 4697, August 21, 2018 (Order No. 4771).

⁵ Docket No. PI2018-2, United States Postal Service Notice of Service Performance Measurement System Modification, September 20, 2018 at 1.

⁶ Docket No. PI2018-2, Order Conditionally Approving Modification to Market Dominant Service Performance Measurement Systems, November 5, 2018 at 4-11 (Order No. 4872).

⁷ Docket No. PI2019-1, United States Postal Service Response to Order No. 4945 and Request for Approval of Service Performance Measurement System Modification, May 21, 2019 at 1.

Day service standards for First-Class Mail in place of just the Three-to-Five-Day service standard to align with the upcoming service standard changes taking effect on October 1, 2021 as a result of N2021-1. Request at 1. Second, consistent with Order No. 5576,⁸ the replacement of certain references to external SPM with internal SPM. *Id* at 1-2. The Public Representative also has some additional comments and observations not explicitly pertaining to the two stated material changes.

In addition to filing their Request, the Postal Service filed an accompanying Library Reference.⁹ This Library Reference contained three PDF documents; USPS_Preface_PI2021-3_LR1 – 083121.pdf (Preface), iSPM_RevPlan_BLACK-LINE – 083121.pdf (Blackline), and iSPM_RevPlan_RED-LINE – 083121.pdf (Redline). The Redline document shows all the changes the Postal Service is making from the previous iteration and the Blackline document presents what these changes will appear as if approved.

1. Additional Reporting for Three-Day, Four-Day, and Five-Day service standards for First-Class Mail

Pursuant to the Postal Service's desire to align their SPM Plan with the upcoming service standard changes taking effect on October 1, 2021, the Postal Service makes a number of edits to their First-Class Mail section. These updates to the service standards can be found in the Redline document between pages 25 and 27, and in the Blackline document on pages 19 and 20. The Public Representative concludes that the Postal Service has completed their desired task.

2. Replacement of References to the External SPM

⁸ PRC Order No. 5576, Order Granting Request and Approving Use of Internal Service Performance Measurement System, PRC Docket No. PI2019-1 (July 1, 2020).

⁹ Docket No. PI2021-3, USPS-LR-PI2021-3/1 – Revised USPS Service Performance Measurement Plan, August 31, 2021.

Remaining consistent with Order No. 5576, the Modified SPM plan identified language that made reference to external SPM and replaced it with relevant language. Per the proposed SPM plan, there does not appear to be references to the external legacy system. The Public Representative concludes that the Postal Service has completed the requested task.

3. Miscellaneous Observations and Comments by the Public Representative
Throughout review of both the Redline and Blackline versions of the modified SPM plan, the Public Representative found himself doing double-takes and re-reading for diction and/or clarity. His thoughts are:

- a. Both the “Table of Tables” and “Table of Figures” sections have formatting issues. The page number for “Table 10-1: National Critical Entry Times” does not extend far enough. Blackline at 4. Additionally, please see Image 1 below to see both a formatting error and mislabeled Figures. *Id.*

Image 1: Mislabeled Figures

Figure 10-7: “Start-the-Clock” Decision Tree for mail deposited at the DMO	70
Figure 1-1: Example of “Start-the-Clock” Decision Tree for mail USPS transported.....	50
Figure 10-6: “Start-the-Clock” Decision Tree for mailer transported mail	51
Figure 10-7: Example of “Start-the-Clock” Decision Tree for mail received after appointment time.....	52

The Public Representative believes Figure 1-1 is mislabeled. Figure 1-1, Figure 10-6, and Figure 10-7 do not correspond to the listed titles on the page numbers later in the document. For instance, Figure 10-6 is an “Example of “Start-the-Clock” Decision Tree for mail received after appointment time.” Additionally, there is no Figure on page 52 of the Blackline.

- b. The Public Representative suggests the Postal Service include a map or more elaborate descriptions of relevant postal areas and their subordinate postal districts. The Postal Service appropriately edited out the soon to be antiquated language. Redline at 10. Unfortunately, the Postal Service did not replace this language with a description of the new relevant areas and the Public Representative believes that a visual aid or further description will benefit the public going forward.

- c. A sentence from Section 9.8 Stamp Fulfillment Services (SFS) appears to have merged with Section 9.9 Green Card Return Receipt – Current State. Blackline at 40. Please see Image 2 below for further detail:

Image 2: Merged SFS Section

9.9 ***Business days are defined as non-holiday working days, Monday through Friday. The following items are excluded from measurement: pre-orders and backorders, planned system downtime with customer notification, and system failures (unplanned downtime). Green Card Return Receipt – Current State***

- d. An instance of intending to write “event,” but only wrote “even.” Final bullet point, and only bolded bullet point, under “Start-the-Clock” Event Example: Mail Entered at a BMEU.” Blackline at 45-46.
- e. The Public Representative seeks clarity on how the Postal Service is conveying information or editing. On page 66 of the Redline document, the Postal Service blacks out a portion of [edited] “Figure 10-11: Example of “Start-the-Clock” Decision Tree for Drop Shipment at a Delivery Unit” and that translated to a faded section for the same Figure on page 57 of the Blackline document. Using the Figure labels as laid out in the Blackline document, Figure 10-4, Figure 10-6, and Figure 10-9 all have faded elements. Blackline at 49, 51, and 55, respectively. Did the Postal Service intend this? The Public Representative’s confusion is further compounded by the presentation of “Figure 10-4: Example of “Start-the-Clock” Decision Tree for mail USPS transported.” Redline at 58 and Blackline at 49. The Redline document’s version of Figure 10-4 is clearly edited to omit information, while the Blackline’s version of Figure 10-4 possesses the previously mentioned faded element. In short, the Public Representative believes he is observing inconsistent and confusing editing practices.
- f. The Public Representative observes the snippet “...is measured through the proposed SPM system.” Blackline at 64. Reference to a “proposed” system implies the potential existence of a legacy system, something that the Public Representative thinks Order No. 4945 said to clean up.
- g. An “Error! Reference source not found” appears twice in the Carrier Route section of the Mail Classification Schedule (MCS) Product List. Blackline at 68.

The Public Representative believes the Postal Service is obligated to furnish the public with a document that is as error free and clear as possible. He imagines the Postal Service has already addressed the more basic formatting and consistency errors,

but wants to ensure no stone is potentially left unturned. The Public Representative concludes that while his comments in his miscellaneous section gave him pause, the Postal Service ultimately did complete their desired tasks as mentioned in the Request and finds no substantive reason that these changes to the SPM plan should not be accepted.

IV. CONCLUSION

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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